



MICHIGAN DIVISION

Maint

Interp

6260 Blythefield NE Rockford, MI 49341 October 28, 2003

Karen Gustin Pictured Rocks National Seashore P.O. Box 40 N8391 Sand Point Road Munising, MI 49862-0040

Dear Ms. Gustin:

I have reviewed the Draft General Management Plan Wilderness Study.

Environmental Impact Statement on behalf of the Michigan Division of the Izaak Walton League of America and offer the following comments for your consideration. First, congratulations to you and the National Park Service (NPS) for providing a well written and easy to understand document for review.

It is my view, the NPS needs to provide access for the public to areas of the park that will leave visitors with a favorable impression of the ecological and scenic significance of this park while protecting those same assets from abuse and overuse. It also needs to provide other users with a wilderness experience if they choose to find it.

The Preferred Alternative appears to best meet those objectives although including parts of some of the other alternatives might strengthen both the access and the wilderness experience. For that reason, I encourage you to have whichever alternative you choose remain flexible so it can change to meet changing needs and challenges.

Motorized vehicle access, whether it be automotive, snowmobile, ATV, etc. should be limited to major points of interest or as access to facilities such as campgrounds or picnic areas. Consideration should be given to restricting lake access within the park to non-motorized boats only. Unimproved access

lake access within the park to non-motorized boats only. Unimproved access should be maintained for hiking, cross country skiing, and for use by NPS for access for maintenance and fire control if necessary. And, consideration should be given to expanding the protection of the Lake Superior shoreline

The Izaak Walton League, Michigan Division

1. Currently only three lakes in the national lakeshore allow motorized use: Little Beaver and Beaver Lakes (10 horsepower restriction) and Grand Sable Lake (50 horsepower restriction). In balancing the needs of the public and in response to public comment (both for and against motorized use), the National Park Service has decided to ban gasoline motors and allow only electric motors on Little Beaver and Beaver Lakes, and retain the 50 horsepower limit on Grand Sable Lake.

and the internal wilderness areas where possible without curtailing access opportunities to points of interest or facilities.

Maximum protection should be provided to stream crossings, roadside ditches, and lake and stream access points to minimize runoff into the streams and wetlands. Box culverts or bridges should be used wherever possible. All bridge and culvert placements should be sized and installed to not impede up and downstream movements of fish and other forms of wildlife.

Finally, management of the fish and game within Pictured Rocks National Seashore for hunting, fishing and trapping should be regulated by the statewide hunting, fishing, and trapping regulations. Any closures to hunting in and around facilities or for protection of migrating or spawning fish should also correspond with state law.

Thank you for the opportunity to comment on your draft plans. I look forward to being kept informed of the progress of those plans so they can be shared with members of our Division.

Sincerely.

E. John Trimberger, President

Michigan Division

Izaak Walton League of America

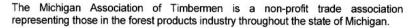
1.

THE MICHIGAN ASSOCIATION OF TIMBERMEN

October 27, 2003

Ms. Karen Gustin National Park Service PO Box 40 Munising, MI 49862





We strongly oppose the proposed addition to Michigan's wilderness area along the Pictured Rocks National Lakeshore. It is our belief that our forests must be managed for the benefit of all, both today and tomorrow. By taking even more land in Michigan and restricting it's use, that management can not be practiced.

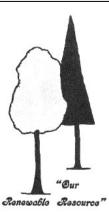
According to the Wilderness fact sheet published by the National Park Service, criteria that land is evaluated against in determining its potential for wilderness includes, "Generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." Would this area not be disallowed for consideration due to the roads, ATV trails, campground and cabins it will include?

We do not feel it is necessary to further restrict the enjoyment many have on this land. The nature of the people we represent is to find enjoyment in outdoor activities. It would be a shame to no longer allow them to participate in so many activities such as boating or ATV use. Michigan currently has over 249,000 acres of federally designated wilderness therefore, The Michigan Association of Timbermen would like to go on record as opposing any additional wilderness area.

Respectfully,

MI Association of Timbermen

cc: Governor Jennifer Granholm
US Senator Carl Levin
US Senator Debbie Stabenow
US Representative Bart Stupak
Representative Stephen Adamini
Senator Mike Prusi



The Michigan Association of Timbermen

1. Please see response 1 to the city of Munising Resolution. In addition ATV use is not currently permitted in the area proposed for wilderness nor is it proposed. The only remaining building from the Michigan-Wisconsin Pipeline Company is a garage, which would be removed if wilderness is designated.



THE WILDERNESS SOCIETY

November 12, 2003

Ms. Karen Gustin National Park Service Pictured Rocks National Lakeshore P.O. Box 40 N8391 Sand Point Road Munising, MI 49862

Dear Hearing Officer Gustin:

The Wilderness Society (TWS) appreciates the opportunity to submit comments on Pictured Rocks National Lakeshore's draft General Management Plan (GMP) and Wilderness Study Environmental Impact Statement. We urge the park to designate the maximum amount of wilderness acreage as possible in this remote location in the upper peninsula of Michigan.

TWS represents over 200,000 Americans nation-wide. We are a not-for profit public interest membership organization headquartered in Washington, D.C. with eight regional offices. Founded in 1935, the Society and its members work to protect America's wilderness and to develop a nationwide network of wild lands through public education, scientific analysis, and advocacy. Our goal is to ensure that future generations enjoy the clean air and water, beauty, wildlife, and opportunities for recreation and spiritual renewal provided by the nation's pristine forests, rivers, deserts, and mountains. TWS has a long history of involvement with the management of the National Park System and a deep commitment to the protection of wilderness areas.

Pictured Rocks National Lakeshore is rich in natural resources. This area is a natural habitat to many key species such as the bald eagle, moose, piping plover, pitcher's thistle, and gray wolf. The lakeshore is characterized by multicolored sandstone cliffs, broad beaches, sand bars, dunes, waterfalls, inland lakes, ponds, marshes, hardwood and coniferous forests. TWS believes it is essential that wilderness be designated at the National Lakeshore to conserve and protect these outstanding resources.

Wilderness designation in the Pictured Rocks National Lakeshore is long overdue. The draft GMP states the National Park Service (NPS) *Management Policies* at the time of the 1981 planning effort precluded wilderness consideration of the area because the federal

1.

"lands will not be excluded solely because of existing rights or privileges (e.g., mineral exploration and development...[.]" If the National Park Service determines that these lands possess wilderness character, they may be included in the suitability determination so that they can be considered for designation as wilderness or potential wilderness.

Although we do not agree with the Lakeshore's interpretation that NPS previous Management Policies prevented wilderness designation because of mineral rights; we do agree that the 2001 Management Policies have clarified the issue. Hence, we strongly believe that wilderness designation must move forward. Furthermore, mineral exploration or development in the National Lakeshore is unlikely due to the agreement between Cleveland Cliffs Iron Company and the NPS.

TWS strongly recommends the adoption of Alternative E with minor modification. Alternative E proposes 18,063 acres of Pictured Rocks National Lakeshore for wilderness designation, which includes parts of Beaver Basin and Chapel Basin. This designation represents approximately 26% of the National Lakeshore. This is a modest amount of land that we believe should be enlarged slightly (to 28%) by adding the 2.094 acres of Grand Sable Dunes to the wilderness recommendation along with additional sections of Beaver and Chapel Basins.

The Grand Sable Dunes rise more than 300 feet above the lake and are a rare occurrence in the Great Lakes region and contain many uncommon plant species and communities. The reason this area was found unsuitable for wilderness consideration in the April 2002 NPS assessment is because of its size and proximity to an Alger County Road. Yet, according to the NPS Management Policies 2001, "National Park Service lands will be considered for wilderness if they are at least 5000 acres or of sufficient size to make practicable their preservation and use in an unimpaired condition." Therefore, size is clearly an insufficient criterion to assert that Grand Sable Dunes are unsuitable for wilderness and preservation. The Wilderness Act define wilderness as areas that are untrammeled by humans, are undeveloped and retain their primeval character. Also areas that have been affected primarily by the forces of nature and offer outstanding opportunities for olitude or primitive and unconfined types of recreation should be considered for wilderness. The Grand Sable Dunes area meets these criteria and plainly qualifies as suitable for wilderness. Furthermore, we disagree with the assertion that Grand Sable Dunes are not suitable for wilderness because of its proximity to Alger County Road H-58. "Wilderness character" is a term that applies to the immediate land not areas outside the area being evaluated for wilderness.

The Wilderness Society

1. Please see response 4 to PEER (Public Employees for Environmental Responsibility).

2

NPS has selected a preferred alternative that fails to protect all of the wilderness areas suitable for designation in Pictured Rocks National Lakeshore. The preferred alternative proposes only 12,843 acres, approximately 18% of the National Lakeshore, for wilderness designation. Unlike Alternative E, the preferred alternative provides no protection to the Chapel Basin area, which is land perfectly suitable for wilderness consideration. The reason this area has not been recommended for wilderness designation is not articulated. We assume it may be related to the foot trails and designated campsites of Chapel Basin. Additionally, it could be due to the old logging road less than 2 miles in length that crosses sections 31 and 32. That road could easily be closed thereby allowing an additional 5,220 acres to be incorporated into the Lakeshore wilderness proposal.

Alternative E also fails to protect all of the land found suitable for wilderness in Beaver Basin. Once again, at issue may be an old, non-maintained administrative road less than 2 miles in length. Also at issue is a vault toilet, bulletin board and one mile self-guided nature trail. The elimination of the toilet and bulletin board would allow the addition of 1,441 acres of wilderness and we believe it is worth the effort. Certainly, if the toilet is necessary to meet the minimum tool requirement to care for the land it may not need to be removed. The trail does not need to be removed and the campsites could easily be converted to walk-in sites.

Regarding personal watercraft use at the Lakeshore, TWS was dismayed to read your notice published on July 21, 2003. As our comments on the personal watercraft (PWC) environmental assessment (EA) indicate, we believe the National Park Service must discontinue personal watercraft use at Pictured Rocks. The EA did not provide adequate site-specific information on resource damage including wildlife and soundscape impacts caused by these machines. In addition, the July 2003 announcement states, "Of the 3300 comments, 602 were personal comments, and 2700 were a form email/letter/postcard. Of the 602 personal comments, 88 percent were for a complete ban and 12 percent supported continued access to the park via PWC. Out of the form email/letter/postcard, 60 percent were for a complete ban and 40 percent were for continued access." This demonstration of public support in addition to a catalogue of information regarding the public safety and environmental impacts should have led the Park Service toward the elimination of PWC. We once again urge the Park Service to ban these machines.

Remember the Organic Act's (16 UCS 1) unmistakable guidance in preservation of natural lands:

"[The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified...by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to

2. Alternative E converts the Little Beaver Lake access road to a trail and the current drive-in sites would become walk-in sites. This area is not excluded from the wilderness considered in alternative E.

COMMENTS RESPONSES

provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

We strongly recommend you take that guidance to heart and provide Pictured Rocks National Lakeshore with the maximum amount of wilderness possible by selecting a modified version of Alternative E that incorporates the Grand Sable Dunes, all of Chapel and Beaver Basins. Thank you for the opportunity to comment, and we look forward to future involvement in this issue.

Sincerely,

Susan H. Gunn, Ph.D.

Director National Parks Program



Upper Peninsula Environmental Coalition

P.O. Box 673, Houghton, Michigan 49931

October 28, 2003

Karen Gustin, Superintendent Pictured Rocks National Lakeshore P.O. Box 40 N8391 Sand Point Road Munising, MI 49862-0040

RE: COMMENTS PERTAINING TO THE DRAFT GENERAL MANAGEMENT
PLAN & WILDERNESS STUDY ENVIRONMENTAL IMPACT STATEMENT FOR
PICTURED ROCKS NATIONAL LAKESHORE

Dear Ms. Gustin:

The following comments are submitted on behalf of the Upper Peninsula Environmental Coalition (UPEC). UPEC is "Dedicated to the Protection and Maintenance of the Unique Environmental Quality of Michigan's Upper Peninsula". UPEC is a non-profit corporation organized in 1975 under the laws of the State of Michigan. It is a regional conservation organization with more than 250 members who reside principally in the Upper Peninsula of Michigan.

Many of our members enjoy visiting Pictured Rocks National Lakeshore (Pictured Rocks herein) and participating in various activities such as hiking, backpacking, canoeing, kayaking and other quiet activities generally focused on the enjoyment of the natural splendor of Pictured Rocks. We favor the maximum protection for these quiet recreational activities as well as for the ecologically valuable resources of the park. Although Alternative E provides the most long-term protection for the natural systems of Pictured Rocks, we recognize that Alternative D (Preferred Alternative herein), the National Park Service preferred alternative, is a compromise between competing interests, and as such we believe that it is acceptable with the qualifications noted in the following paragraphs.

Wilderness Designation:

We strongly favor the protection of Beaver Lake and the Beaver basin area with Wilderness designation as provided for in the Preferred Alternative, and in particular, we favor the removal of motorized watercraft from Beaver Lake and Little Beaver Lake.

274

Upper Peninsula Environmental Coalition management plan comments, Page 2of 3

The opportunity to enjoy the solitude of quiet natural areas in Upper Michigan is rapidly diminishing. Our lake and river shorelines and forestlands are rapidly being developed for residential and vacation homes. Many areas that were previously available for public enjoyment are being closed off.

Although there are many lakes in Upper Michigan, very few of them are protected from the disturbance of motorized watercraft. The removal of motorized watercraft from Beaver Lake and Little Beaver Lake would greatly enhance the experience of both hand propelled watercraft users and of those who hike the shores of those lakes. There are many other lakes nearby for use by those who prefer motorized watercraft.

About the only places where one can enjoy the solitude and quiet natural splendor of an Upper Michigan forest is in our few federal and state parks and wilderness areas. The inclusion of the Beaver Basin area as one of these protected areas will be a welcome and needed addition. Federal wilderness designation for the Beaver Basin area will help to assure that this area remains quiet and natural for the enjoyment of our nation's citizens today and in the future.

Chapel Area:

1

We understand the tremendous popularity of the hiking trails to Lake Superior on either side of Chapel Lake, and the consequent rationale for including this area in the Casual Recreation Management Prescription, but we are concerned that insufficient protection is being provided this spectacular area. The appropriate level of protection for this area seems to lie between the Casual Recreation and the Primitive Management Prescription.

2.

We agree with the inclusion of the Chapel Beach area north of the Lake Shore Trail in the Primitive Management Prescription. We note in Table 2, that the Primitive Management Prescription calls for a visitor experience that provides a sense of remoteness and immersion in nature and that tolerance for noise and visual intrusions would be low. We are concerned that the intense use of large motorized watercraft at Chapel Beach conflicts with the enjoyment of the area by those who have hiked or paddled into the area. Chapel Beach is sufficiently protected by Grand Portal point so that under some wind conditions large motorized watercraft can and do pull up to the beach or anchor close to the shore allowing their passengers to disembark. We believe that the beaching of motorboats and the anchoring of motorboats near the shore should be prohibited at Chapel Beach. The non-motorized zone from the wilderness area should be extended west to Grand Portal Point. Since the primary source of drinking water at the popular Chapel Beach campground is from Lake Superior, the removal of motorized watercraft from this bay would help to protect the health of the campers who are drinking this water.

3.

Social interaction on the trails into Chapel Beach could be reduced by recommending that visitors travel in one direction on the trails. The trails could become one-way going toward the beach starting at Chapel Falls with the return trail on the west side of Chapel Lake ending one-way travel at the intersection of the Mosquito River trail. The one-way

Upper Peninsula Environmental Coalition

1. We disagree that insufficient protection would be provided along the Chapel hiking trails. The casual recreation prescription allows us to formalize/harden the trail surface to accommodate additional use without damaging the surrounding environment. It also allows us to make the trail more accessible to individuals with mobility challenges. Many of the comment letters we received on the draft alternatives and later on the draft plan requested more consideration be given to individuals with mobility challenges.

RESPONSES

- 2. In response to public comment, the management prescription on the 0.25-mile-wide portion of Lake Superior from Spray Falls to the mouth of Sevenmile Creek was changed from primitive to casual recreation. This would make the entire 42-mile portion of Lake Superior accessible to motorized boating (except for personal water craft which would be restricted as noted at the beginning of this document.) Boater safety during inclement weather was also a concern. NPS staff always recommends treating the water from any lake or creek.
- **3.** Deciding the direction of a trail, one -way versus two -way, is not a general management plan level decision. This is an operational issue that can be decided by the NPS staff based upon need.

Upper Peninsula Environmental Coalition management plan comments, Page 3of 3

3.

travel could be presented as a suggestion with an explanation at the trailhead, rather than a rule or a requirement.

Tour Boats:

4.

We agree with the Preferred Alternative plan to reduce tour boat public address system noise, but we believe that the sound system modifications should be required rather than recommended. What are you going to do if the tour boat operator's response to your recommendation is that sound system modifications are too expensive so he cannot afford to modify his boats? How long are we to wait before the noise coming from the tour boats is stopped?

The greatest conflict between those who enjoy the peace and solitude of Pictured Rocks and the tour boat operations occurs at the beaches, and at Chapel Beach in particular. We request that the tour boats be kept further from the beaches to reduce this conflict.

Proposed Drive-in Campground:

5.

We are concerned that the construction of a new campground north of the Miner's Falls road will significantly impair a natural asset of the park. Although the beech, birch, and maple forest where the campground is proposed is relatively immature, as the trees reach a more impressive size this forest could become a significant attraction at Pictured Rocks. Mature hardwood forests are becoming increasingly scarce in Upper Michigan. Construction of this campground conflicts with the mandate that the park be maintained unimpaired for future generations.

Thank you for the opportunity to comment.

Sincerely, William Malmster

William Malmsten, Vice President, speaking for the Board of Directors

- 4. Pictured Rocks Cruises operates under an incidental business permit with the National Park Service. The National Park Service will continue to work cooperatively with Pictured Rocks Cruises on the sound system and operation.
- 5. Construction of a new campground would be dependent upon a substantial increase in camping visitation that cannot be regularly accommodated in the existing national lakeshore campgrounds and surrounding Forest Service and private campgrounds. Prior to design and subsequent construction, an environmental assessment would be prepared to explore campground construction alternatives that would minimize environmental impacts. Another mandate of the national lakeshore is to provide for the use and enjoyment of the national lakeshore for present and future generations.

COMMENTS RESPONSES

David E. Allen 318 E Prospect Marquette, MI, 49855 (906) 228-9453 dallen@nmu.edu

Karen Gustin, Superintendent, Pictured Rocks National Lakeshore P.O. Box 40 Munising, MI, 49862

Comments - Draft General Management Plan and Wilderness Study Environmental Impact Study

My first comment concern the publication itself, which I really liked. It laid out the alternatives quite well, and it provided adequate support. I learned more about Pictured Rocks by reading it.

Let me lay out my preferences:

(E) is slightly preferred to {Preferred} which is preferred to {NoAction} which is strongly preferred to {C} which is strongly preferred to {A}

My preference for $\{E\}$ is based on the additional protection for the wild character of the Chapel - Mosquito area that would be provided by wilderness designation. Support for this is provided by your designation of the Chapel Lake and beach area as casual use.

However, your current management of Chapel suggests that the NPS is quite capable of managing the Chapel area for wild characteristics. The preferred alternative could be strengthened by replacing the casual use designation by primitive, perhaps narrowly designating the area around the privies as casual. Further, I deshe closure of the primitive roads in the Mosquito area. Please note that one has an unprotected (soft) ford or Mosquito Creek - not a BMP-approved ford.

I am pleased with your proposal for the Beaver Basin wilderness study area.

I have always been quite happy (generally) with the peace, quietness and feelings of solitude in both the Chapel and Beaver Basin areas. I have experienced these pleasures during all four seasons - wonderful in each. Occasionally I meet another group on the trail - an intrusion, perhaps, but they have been nice people.

These wild areas are becoming rarer and rarer in the U.S., and thus the need for protection for our existing wild areas becomes more and more important. Further, wild areas provide benchmarks for our biologic intrusions on other lands - a reference point for other management actions other places. The provide refuges for those species that need wild places. And so on.

The more serious intrusions to my peace and solitude have been over Lake Superior. The tour boats, in the past, have had excessively noisy announcers (but last year things seemed much better). Other boats have, on occasion, been noisy, but most larger boats near shore have usually operated there reasonably quietly. But two sources of excessive noise stand out - low-flying aircraft and PWCs. More work remains to be done under any of the various alternatives (as you recognize in the draft).

Further, noisy snowmobiles (those operated at great speed) in the buffer zone are, to say the least, obnoxious. This issue needs addressing, but perhaps not in the GMP.

Individuals

David E. Allen

1. The intent of the preferred alternative as described under the "Concept and General Management Strategies" would be to "expand opportunities for visitor use in the national lakeshore while preserving the central portion of the national lakeshore in a primitive, relatively undisturbed state." The casual recreation prescription around the Chapel area allows us to formalize/harden trails to protect resources and even upgrade portions to allow for handicap access.

COMMENTS RESPO

Experience in Pictured Rocks as well as elsewhere indicates the Pictured Rocks has been managed pretty decently in the past, has pretty good people, and thus will be managed pretty well in the future, with regard to the NPS Organic Act.

Sincerely;

David Allen

COMMENTS RESPONSES

N6919 Tahquamenon Drive Munising, MI 49862

November 7, 2003

Karen Gustin Pictured Rocks National Lakeshore Box 40 N8391 Sand Point Road Munising, MI 49862

I apologize for the lateness of these comments on the Draft GMP for the Pictured Rocks National Lakeshore. I will be brief.

As a local resident for the past 13 years, I treasure the resources contained in the Lakeshore and have the utmost respect for the staff that manages it. For the most part I support the rationale presented for the Preferred Alternative. My comments are focused on the proposed wilderness designation for Beaver Basin.

I support some of the Lakeshore being potentially designated as wilderness. It is important for future generations to have the opportunity to experience the qualities and values of lands managed as a federally designated wilderness. However, I also understand the sincere and strong opposition from local residents to the concept of wilderness designation. I respectfully submit the following approach.

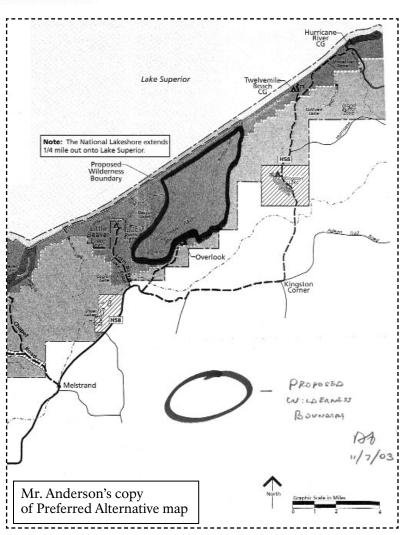
Please consider drawing the potential wilderness boundary as shown on my attached map. My suggested boundary would exclude both Beaver and Little Beaver Lakes as well as a one-quarter mile wide strip of land inland from the shoreline across the northern boundary of the proposed wilderness. The advantage of this approach would be to allocate a significant portion of the Lakeshore as potential wilderness, but at the same time allow continued traditional access to angling and boating activities for (primarily) the local public. My suggested approach is a compromise and would go a long way toward improving and making stronger the relationship between the National Park Service and the area residents. From 30 years of professional experience I appreciate the importance of a strong relationship between an agency and the area residents.

I would offer one final observation if wilderness designation is proposed. I would suggest changing the configuration and layout of the backcountry campsites in the potential wilderness zone. Sites should NOT be grouped together. Each individual campsite should be separated from one another to give a greater opportunity for solitude and reduced encounters with other humans. Also, all group sites should be eliminated and limits on group size for day users should be imposed to again offer increased opportunities for primitive recreation experiences.

Richard A. Anderson

1. We changed the preferred alternative in response to public comments, and this also addressed several of your concerns. We changed the 8.5-mile-stretch of Lake Superior from primitive prescription to casual recreation prescription, which would allow for motorized boating access. We also changed the alternative to allow electric motors on Little Beaver and Beaver Lakes and prohibit gasoline motors.





General Management P Comments	lan
Comments	
	Pictured Rocks National Lakeshore National Park Service U.S. Department of the Interior
Name: ARTIBEE DAN W.	
Last Name	First Name
Affiliation (if any) E5347 M-94	
Mailing Address FOREST LAKE, MI 498	63
City Sta	tte ZIP
What makes Pictured Rocks National Lakeshore special to	oyou? My family has owned
160 ACRES OF PRIMITIVE LAND IN the Butter	e tour on the MOSOUTO RIVER I
would like to see it remain PRINTING SO MY CHILL	DREA & GRADOR HILDREN CAN ENJOY it IN FETURE YES
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What else would you like to tell us: The ECONOMIC AND CLOSE STATUS THE PENL PRINGS IN \$14.8 m, LLIAN TO THE JOCAL AREA, FAILS TO STATE HOST THE DEVELOPRIES OF THESE MONIES ARE AUNTESOF RESTAURANTS, BARS Photicus (OVER)
Comments may be left with a planning team member at the meeting or mailed to: Pictured Rocks National Lakeshore, P.O. Box 40, Munising, MI 49862. The comment period closes October 31, 2003.

Dan W. Artibee

1. Although some of the profits generated by restaurants, bars, and motels may leave the county because of owners that live or are headquartered outside the county, approximately \$4.8 million is generated in direct personal income in the form of wages and salaries for local residents (2002 Visitor Services Project conducted by University of Idaho).

COMMENTS RESPONSES

1.

Additional Comment (Continued)

Since the owners of these Establish ments make up less than 5% of the ALGER County Residents you fair to mention that 95% plus of us to eats never realize 5¢ of this 14.8 mileron. Additionally motels buch as Best Western et al were constructed by brig corporations outside of ALGER County and thus shews your floures. The momes they realize are taken outside of ALGER County!



Rane Curl
<ranecurl@engin.umic
h.edu>

10/22/2003 12:36 PM AST To: Karen Gustin <piro_gmp@nps.gov>

CC:

Subject: Comments on Pictured Rocks NL DRAFT GMP. (fwd)

(Being resent to include my address.)

21 October 2003

Ms. Karen C. Gustin, Superintendent Pictured Rocks National Lakeshore P.O.Box 40, N8391 Sand Point Rd. Munising, MI 49862-0040

Dear Ms. Gustin:

Thank you for sending me the DRAFT General Management Plan for Pictured Rock National Lakeshore.

If you are keeping tally from comments received in correspondence, I support either the Preferred Alternative or Alternative E, in order to ensure some Wilderness designation. I believe that, if at all possible, every National Monument, Park, Lakeshore, etc, should have a range of land use designations to address the interests of visitors, ranging from public amenities to wilderness. Since the Lakeshore does apparently have lands hat are considered acceptable for Wilderness designation, some should be so 'esignated. I think that the existence of designated Wilderness at the Lakeshore will also increase the attraction for additional visitors of a wider range of interests, who not only would increase domestic and International knowledge of the Lakeshore, but also assist the local economy with their expenditures.

However expressing that preference is not my main reason for writing.

Throughout the DRAFT the many natural features of the Lakeshore are noted, and the Alternative plans address cultural and natural resources, including historical, archeological, habitats, species of concern, and of course geological resources - the "Pictured Rocks" themselves and associated geological features. There is, however, an omission of mention of one important resource, which are the caves the are abundant at the Lakeshore.

I note that the Federal Cave Resource Protection Act (FCRPA) of 1988 is listed on page 252, in Appendix C: Laws and Executive Orders. But most striking is the fact that an illustration highlighting the cave resources of the Lakeshore was chosen for the cover of the DRAFT.

I could continue with a more detailed discussion of the many points in the DRAFT where recognition of the cave resources, and possible impacts upon them by the diverse Lakeshore uses (and users), would be appropriate. However I think it best that I first just ask to what extent have the provisions of the FCRPA been implemented already in inventorying and determining the significance of the caves of the Lakeshore?

Thank you for your consideration of my comments.

Rane Curl

1. Actions in the general management plan will have no adverse effects on cave resources. Management of cave resources will be addressed in a future plan. See the "Future Studies Needed" section of the plan.

COMMENTS RESPONSES

Sincerely,

Rane L Curl 2805 Gladstone Avenue Ann Arbor, MI 46104-6432 734-995-2678 ranecurl@umich.edu

cc: Ronal Kerbo

ber 31, 2003.

		National Park Service
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Robert Denman

1. Please see response 4 to the city of Munising's resolution.

General Management Plan Comments

Pictured Rocks National Lakeshore National Park Service U.S. Department of the Interior

good health

Last Name Ely	First Name
Affiliation (if any)	
Mailing Address	9 H-15
City Shing	eton State Mich ZIP 49884

Fishing and Suimping. Multi access by motorized vehicals to most places in the park. The use of motorized boats to see the park has been which alternative do you prefer and why? Cor A. I believe that most people go on vacation to have fur and see as much as they can with very little time spent in one spot. I more veel toads & trail nightestavel man with very with its jour opinion of the Preferred Alternative and how could we improve it? Why?

I am NOT for a Wilderness Area in the park. I believe that a world park should be easily accessed by anyone no matter how old on young they are or what there health conditions are In a Wilderness Area permanent structure improvements are not allowed. The trail system in this area beeds structure such as, board walks, steps bridges and handrails' to help people get to basin area's. This area has swamps, much creeks and Rivers to crass. Without the use of structures the trail would be a press.

I am sorry but I do not believe the word Wilderness Area is going to ortract more visitors - Most's Visitor like improved

Comments may be left with a planning team member at the meeting or mailed to: Pictured Rocks National Lakeshore, P.O. Box 40, Munising, MI 49862. The comment period closes October 31, 2003.

What else would you like to tell us?

noes and kayaks. Moybe a few fisherman would noes and kayaks. Moybe a few fisherman would we a regular boat out on little or big beaver.

Inoes are very dangerous to use on Big Beaver Lake.

Waves can easily flip these boats over. Which may sult in lost of gear getting wet when it is cold out, maybe an loss of life. Kayak are mostly used by wilderness pe people. But kayaks used by unexperienced people. Big Beaver lake may result in some drownings.

Egular boats using oars would be mostly used by fisherman is type of transportion would make fishing in Big Beaver ary un desireable. Oaring a boat I to yould be during a fishing rip is not a fun trip at all. Because this Big Beaver lake so bigg the use of an electric mostly would help greatly

be able to See this lake for all types of people.

Know some boats that have motors on them can be loud, at there is a 10 hps limit tate now on the lakes. So the notors you see & hear are small with very little noise. The use of Electric Motors would be NO NOISE, If this trea became a Wilderness Area (Note Boats being cared make alot of Noise). To make Beaver Basin a Wilderness Area would limit the use of the area to Only the physical Able to hike or paddle into this area. Young children, Families, handica People with health problems would not be able to go into this area. The Beaver Basin Area is an area in the

Park that should be seen by exeryone.

Thank you.

John Ely

1. Please see response 2 to the Burt Township Board.

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Dear Park Service Personel

I'm Not in Layor of the Management Plan where out board motors are not permetted to drive within a "4 of a mile from shore along the north side of the park in Lake Superior. I do not think thatitis fair for all the

people that want to see the park. The only people that this park will want to visit it are people that are in Excellent Health, love walking trails, and from ages 30 to 50. Think about it, a 14 of a mile Stom shore is a long ways to be able to see the Sites along the shore.

Thank you.

9-10-03

October 31, 2003

Karen Gustin Superintendent Pictured Rocks National Lakeshore P.O. Box 40, Sand Point Road Munising, Michigan 49862

Dear Karen,

As the time for comments on the future of the park draws near I wanted to make sure to include - again, for the official record, the issues that are near and dear to my heart. I know you have been swamped by the task of looking into A thru E long range management plans and the local backlash generated by the idea of making a wilderness designation for part of the park, but there are still other concerns that I have. These are not new concerns. I have always talked with Park staff, superintendent or rangers, on a yearly basis and at least on two occasions presented my thoughts to the superintendent in writing. (Reference L3427 dated 9/16/1998). I hope when the dust clears from your immediate concern of the Beaver Basin issue that we may meet and talk in person at your convenience.

My concerns include:

- 1. The continued use of an unauthorized snowmobile trail from Carmondy Road to East City Limits Road.
- 2. The location of the current authorized snowmobile trail from East City Limits Road to Munising Bay and the logic behind inter-mixing ski trails and machines in this manner.
- 3. The legal description of the hunting zone which extends from the end of East City Limits road and the reasoning behind its description.

Those are my on-going dialogue issues with Park staff and I have yet to get responsible, clear answers back as to if, or how, or when changes could be made. I have always been told to be patient with the old superintendent, (Grant Peterson) that he would be retiring soon, and a new superintendent (you) would look into my concerns with a more active approach. Time will tell.

As for your "wilderness" problem let me say this, some people cannot speak to loudly within this community without suffering repercussions from the local power structure. Not everyone is against your suggested plan but I do believe that electric, non-polluting motors should be allowed within the Beaver

Basin watershed. And as for giving Sand Point back to the city, well the one thing Munising has proven it that it cannot manage itself, let alone any new responsibilities. Sand Point (and the Park) belongs to the nation, the state, and the county - in that order. The city of Munising does not even make the list of responsible alternatives.

I hope to talk with you soon

Respectfully,

Erik Frosh N7510 East City Limits Road

Munising, Michigan 49862 (906) 387-3801

erikfrosh@hotmail.com

Erik Frosh

1. Please see response 2 to the Burt Township Board.

Jonathan Gennick

126 W. Varnum • Munising MI 49862 • USA • 906.387.1698

Pictured Rocks National Lakeshore P.O. Box 40 Munising MI 49862

I'm writing to comment on the plan to designate a portion of the Pictured Rocks National Lakeshore as a national wilderness area. I'm writing on my own behalf, not on the part of any organization.

I'm opposed to the wilderness designation. My strong preference is for no portion of the park to be declared a wilderness area. I'm happy enough to keep the Beaver Basin area relatively roadless and undeveloped, managed as it has been for some years now, but I see no reason to give up future flexibility by making it an official wilderness.

In the recent town meeting, I was disheartened to hear Mark Geitka tell of his problems with the Park Service, of practically losing his business and livelihood, because of Washington's decision to regulate overflights of National Parks. He apparently hasn't been able to sell air tours over Pictured Rocks at all during the entire 2003 season. Mark is a victim here. He's a victim of rules made, not by the local population they affect, but by a bureaucrat thousands of miles away who is solving a problem that does not exist locally.

We've had no problems that I'm aware of with too much air traffic over the Pictured Rocks, and yet Mark has had to suffer because those who make the rules are many layers removed from the effects of their decisions. Making a portion of the park into a wilderness area would only exacerbate this problem. Already we hear local Park Service officials laying the blame for certain decisions (e.g. the decision to halt Mark Geitka's air tours) on laws passed by congress, over which they, the local officials, have no control. This is a litany we will hear all the more if a wilderness area is created. Indeed! We already hear this increasing litany, in the news that a wilderness declaration would force closure of 12-mile beach to boating traffic. What a shame that would be! A wilderness declaration would increase our exposure to the illeffects of rules made by strangers who have never been to Munising, who have no knowledge of the local realities.

I truly enjoy wilderness. I'm thankful to live in a county that contains wild lands, areas that are difficult to access, where few feet have trod, where I can

Jonathan Gennick

1. The National Parks Air Tour Management Act of 2000 applies to any person who conducts a commercial tour operation over a unit of the national park system, over tribal lands that are within or abutting a unit of the national park system, or any area within 0.5 mile outside a unit of the national park system. This act requires all persons operating or intending to operate a commercial air tour operation apply to the Federal Aviation Administration (FAA) for authority to conduct such activity. In addition, the act requires the Federal Aviation Administration and the National Park Service to develop an air tour management plan for each unit of the national park system or tribal land that does not have a plan in effect at the time a person applies for authority to conduct such an operation. The Federal Aviation Administration is the lead agency on this issue, not the National Park Service, and the Federal Aviation Administration is the agency that processes the applications from the operators. Designating the Beaver Basin as wilderness would not preclude a commercial air tour operation at Pictured Rocks National Lakeshore.

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COMMENTS RESPONSES

truly enjoy nature in a peaceful and quiet setting. But we have this now. Let's not endanger our future enjoyment of the park by overly-constraining the way in which it develops.

Having made clear my opposition to the wilderness declaration, let me take this opportunity to mention a few things you could do to make the park more enjoyable to me and my family:

2.	•	Put in some bicycle trails. Would it be so bad for me to bike in to
		Chapel Beach, or to Mosquito Beach? Wouldn't it be great if I could do a
		bicycle-camping trip through the park? In general, I'm in favor of
		enabling various forms of non-motorized travel. Currently, the Park is
		much too optimized for foot-travel.
3. [Widen the trails. When I hike with my son. I want to hike beside my son.

4.

5.

6.

7.

8.

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Widen the trails. When I hike with my son, I want to hike beside my son.
 To do that now, I'm forced to widen the trail myself, the hard way, by stomping in the brush off to one side.

- Allow pets on more of the trails, and without a leash. Last weekend I had to make a hard choice between hiking in the Park with friends and not walking my dog, or taking my dog for a walk in the woods near my house and not walking with my friends. I've heard that hunters can take dogs into the park. Is that true? If hunters can take in a dog, why can't I? At the very least, allow pets off-leash given a reasonable distance, say a couple hundred feet, from the tourist trails. Then I could take my dog with me when I go exploring off-trail, which is something I like very much to do.
- Allow random camping in the off-trail portion of the park. The park is large enough to sustain quite a number of dispersed campers.
 Kayakers too, I'm sure, would welcome the ability to pull up and camp on any beach. Frankly, I'd enjoy being able to camp on the beach. I'm sure the sand would survive.
- Find a way to allow for more spontaneity when it comes to back-country camping. I am not a plan-ahead type of person. Last time I went camping in the park, I made the decision after supper on a Saturday, and went that night. But it was impossible at that time to arrange for a back-country permit, so my son and I settled for a drive-in campsite.
- Allow fires by each tent in the back-country. Not everyone wants to partake of a communal fire.
- Lastly, and this one will surprise you I'm sure, disallow hunting in the
 park. The U.P. is chock full of places to hunt, but there are absolutely no
 safe places for non-hunters to enjoy the fall woods, and fall is arguably
 the best time to be out, because there are no bugs! Every day when I
 walk my dog in the woods near my house I am nagged by the fear of
 getting shot at accidentally by a bow-hunter, or by a gun-hunter. I'd
 welcome a 40-mile long safe-haven.

2. Bicycle use is allowed on all roads that accommodate motorized vehicles. Due to the sandy nature of the soil at the national lakeshore, off- road bicycle use would quickly destroy the trails.

- **3.** The preferred alternative includes upgrading the trails in the Chapel area.
- **4.** According to 36 *Code of Federal Regulations* 2.15 (a)(2) pets must be restrained on a leash which shall not exceed 6 feet in length. The justification for this regulation is visitor and wildlife protection.
- 5. Random camping is not allowed because of concerns of illegal fires, potential adverse impacts on natural and cultural resources, and potential cutting of vegetation and clearing of brush for campsites. The national lakeshore started providing random camping in winter on a trial basis in the winter of 2003-2004. NPS managers feel this is acceptable due to the low numbers of use in winter along with several other factors, e.g., campers cannot locate designated sites in winter under snow, random camping allows visitors to camp away from the edge of the bluffs above Lake Superior and out of the wind, and current regulations do not allow fires outside of designated sites, so there is no danger from fires due to random camping. At the end of the 2003-2004 winter season, NPS staff will evaluate whether or not to continue offering the random camping experience in the winter.
- **6.** The backcountry permit system allows national lakeshore staff to restrict the number of users at any particular site to ensure a quality visitor experience for all campers.
- 7. Restricting fire use to designated fire rings reduces the environmental damage in an area.
- 8. Hunting is allowed in the establishing legislation in the national lakeshore and is regulated by the Michigan Department of Natural Resources.

9.

If trapping is allowed (is it?) you should definitely disable that, because
I go off trail a lot, and I'd hate to think my son and I are at risk of
stepping on some trap and having our ankles mangled.

I do sometimes feel the park is overly optimized for backpackers. Yet there are so many other forms of non-motorized travel. It wouldn't take much to add or modify trails to accommodate mountain-bike riders, horseback-riders, and skiers who wanted to traverse the park and camp along the way. Who knows, perhaps you could put in a 40-mile long, paved, roller-blade trail and inaugurate roller-blade backpacking. It's a thought, isn't it?

Thank you for taking the time to read my comments. I realize you may find yourself aghast at some of my suggestions. I like the park very much, but often feel put off by some of the restrictions and regulations. I certainly don't feel the need for even more of those, and hence my opposition to any wilderness declaration covering even a portion of the park. Rather, I would prefer to see more thought given to other forms of non-motorized travel than just foot-travel, and I'd like to see more consideration given to user-groups other than backpackers.

Sincerely, Janatha Nermid

Jonathan Gennick

- **9.** Trapping is not allowed in the shoreline zone by federal regulation (36 *Code of Federal Regulations* 2.2 (b)(3)); however, it is allowed on private property in the inland buffer zone.
- 10. As mentioned in response 1, the sandy soils of the national lakeshore preclude use of bicycles and horses on trails due to impacts. This use is allowed, however, on any of the roads open to motorized vehicles. Cross-country skiers currently use the trail system in the winter.

E9460 Orchard St. Munising, MI 49862 29. October 2003

I appreciate the opportunity to comment in the final round of public comment of the General Management Plan for Pictured Rocks National Lakeshore.

I favor the Preferred Alternative. However, I do not think it is wise to establish a boat-in campground on Grand Sable Lake as presently illustrated. The location marked on the map for that site is very steep. A boat dock would be needed to land boats, and an extensive stairway would be required to reach terrain flat enough to pitch a tent. Nearly the entire western side of Grand Sable Lake has a similar slope at water's edge. There are several openings on the eastern side of the lake where cottages once stood. These might be suitable for boat-in sites, because the clearings already exist, and access from the water is unencumbered. One disadvantage might be that a dirt road exists not far from them to the east.

Thank you for the tedious work in preparing the various alternatives of General Management Plan and the staff's efforts compiling public comment.

Yours truly,

Lora

Delora M. Loope

Delora M. Loope

1. The exact location of the boat-in campsites would be determined before construction. The current location depicted in the draft plan is one option, but other alternative sites will be explored.

MUNISING, MI. 49862

COTTER #MO17-0

October 30, 2003

United States Dept. of Interior Pictured Rocks National Lakeshore PO Box 40 Munising, Michigan 49862-0040

Attn: Karen Gustin Park Superintendant



Lawn and Garden

Dear Ms. Gustin,

I'm writing this letter in regard to the General Management Plan and your Preferred Alternative D. I do not agree with this plan and would prefer you adopt Alternative C.

In the past years, as a boater, I have used the area between Munising and Grand Marais numerous times as a recreational area for swimming and camping on 12-mile beach. I strongly believe that the ¼ mile restriction should be lifted.

I think that there should be a decent road between Munising and Grand Marais so everyone could enjoy this scenic drive. Tourism is a major industry here in Alger County and the National Lakeshore should be open and available to everyone.

Sincerely,

Richard Madigan President Madigans True Value Hardware

RM/ams



Housewares



Tru-Test Paints



Hand & Power Too



Electrical Supplies



Richard Madigan

1. Please see response 4 to the city of Munising's resolution.

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COMMENTS RESPONSES

COMMENTS

Regarding:
Draft
General Management Plan and Wilderness Study
Environmental Impact Statement
Pictured Rocks National Lakeshore
Alger County, Michigan

Submitted to:
Karen Gustin
Pictured Rocks National Lakeshore
P.O. Box 40
N8391 Sand Point Road
Munising, MI 49862-0040

Submitted By: Douglas Meeusen 2235 Pheasant NW Grand Rapids, MI 49544 Phone: 616-791-1468

The Buffer Zone

The enabling legislation in Public Law 89-668, Sec.9(a) refers to "sustained yield timber management". Are you to sustain a particular yield of weed trees for pulp cutting? Is that what must go on in the inland buffer zone? Or, must there be a sustainable yield of 2" x 12" x 10' beech timber.

The one sustainable yield definition encourages the growing of a poplar or other weed tree forest to be frequently logged and chipped up for the paper industry. The other definition implies selective cutting of large trees encouraging a mature and biodiverse forest.

Where in the draft management plan is a definition of sustainable yield in the buffer zone? What exact yield of which species do you have in mind? Can this yield be sustainable? Is this scientifically demonstrated? The enabling legislation says, "sustained yield timber management". You are obligated to prove and demonstrate with a plan just exactly how this sustainable yield is carried out.

The enabling legislation does not obligate the NPS to serve the needs of the ForestLand Group, Limited Liability Corporation. This company is not, to my knowledge, certified by Scientific Certification Systems, SmartWood, or the Forestry Stewardship Council for sustainable yield forestry practices. Pictured Rocks National Lakeshore management is well within the rights of the enabling legislation to require a sustainable yield plan for every square foot of privately held timber land within the buffer zone.

The draft is not complete unless a clear plan of sustainable yield forest practices is included for timber lands within the buffer zone which are held by ForestLand Group, Limited Liability Corporation.

The preferred alternative, mixed use prescription, says" Mixed use areas would be managed to continue opportunities for extractive and recreational activities...". In addition it says, " Management of these areas would not be significantly different than current management.". There is talk of a "demonstration forest" in the buffer zone which is "consistent with the enabling legislation".

Where in the legislation is there any talk or implication of a "demonstration forest" in the buffer zone? Am I to gather from this that there is a plan afoot, using an as yet undefined plan of sustainable yield forest practice, for a demonstration forest of current logging practice?

The draft management plan must specifically state the connection between the enabling legislation and a "demonstration forest" in the buffer zone. If you are going to propose a "demonstration forest", you must clearly define the sustainable yield specifics which are to be demonstrated.

Douglas Meeusen

1. Sustainable yield is defined as: The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality, and potential to fulfill, now and in the future, relevant ecological, economic, and social functions at local, national, and global levels, and that does not cause damage to other ecosystems (J.A. Helms, ed., *The Dictionary of Forestry*, 1998. Bethesda, MD: Society of American Foresters.).

Pictured Rocks National Lakeshore does not currently require timber management plans from inland buffer zone owners. National lakeshore staff does participate in Michigan Department of Natural Resources compartment reviews, reviewing and commenting upon planned logging operations, and our comments are taken into account. The national lakeshore staff also has initiated a vegetation inventory and monitoring program, in part to assess forest conditions resulting from forest management practices in the inland buffer zone. The National Park Service and The Nature Conservancy are currently encouraging the Michigan Department of Natural Resources and The Forestland Group to become Sustainable Forestry Initiative and Forestry Stewardship Council certified. They are participating willingly and are on their way to becoming certified under both programs.

2. The demonstration forest would be an interpretive tool for the national lakeshore to use in explaining and demonstrating sustainable forest management practices. The enabling legislation (Public Law 89-668, October 15, 1966) section 9(a) states "The area hereinafter described in subsection (b) of this section is hereby established as an inland buffer zone in order to stabilize and protect the existing character and uses of the lands, waters, and other properties within such zone for the purpose of preserving the setting of the shoreline and lakes, protecting the watersheds and streams, and providing for the fullest economic utilization of the renewable resources through sustained yield timber management and other resource management compatible with the purposes of this Act." An early Master Plan, which was the precursor to the 1981 General Management Plan, recommended developing an interpretive exhibit that focuses on sustained yield timber management, and the subsequent enabling legislation was consistent with this idea. It was from this concept that the idea for the demonstration forest was started.

On page 14, the draft management plan indicated ForestLand Group, Limited Partnership has been issued special use permits to move logging equipment and haul forest products

within the buffer zone.

revoked.

On page 179 and page 214 under the Noise heading for the preferred alternative and alternative E the draft indicates there will be noise coming from chainsaws in the inland buffer zone. This noise is termed a "continuing adverse short-term minor to moderate cumulative impacts on the natural quiet ... ".

Nothing is said in the draft management plan about the noise created by logging equipment that has been issued special permits for operation. Big diesel bulldozers, big diesel trucks, big diesel yarders, and modern tree felling machines all have permits to prowl the inland buffer zone. Surely, a significant level of noise is created during their operation.

The draft management plan must clearly address noise from all logging equipment within the inland buffer zone. I submit the draft management is incomplete without addressing this issue in reasonable detail.

The enabling legislation does not specifically state or require that the NPS give permits for, or allow the use of, internal combustion engine powered logging equipment to be moved within or used in the inland buffer zone. The enabling legislation says nothing about allowing the use of internal combustion engine powered chainsaws.

Public Law 89-688 Sec. 9 (a) says,"...and providing for the fullest economic utilization of the renewable resources through sustained yield timber management...". It says nothing about how this timber management should be carried out.

Based on the need for noise abatement and the discretionary bounds of the enabling legislation I ask that you incorporate as part of this draft plan a statement or statements indicating you will no longer issue permits to ForestLand Group, Limited Partnership for the use, within the buffer zone, of any internal combustion engine powered logging equipment or chainsaws. Any existing permits allowing this activity will be modified or

Staying within the discretionary bounds of the enabling legislation your policy can be changed to allow logging within the inland buffer zone using what is known as horse logging. All timber falling will be done by human, hand powered saws only. All forest products will be moved by horse, donkey, llama, or other live animal powered locomotion only. All animals will be treated in a humane manner.

This is well within the National Parks discretionary powers regarding the enabling legislation. The problems of noise and many other land degradation problems will be solved by a switch to horse logging and human powered timber falling within the inland buffer zone.

- 3. We added "and logging vehicles and" chainsaws in the impacts sections for the alternatives.
- 4. The enabling legislation does not specifically state that internal combustion engines can not be used in the inland buffer zone.
- **5.** Noise from logging operations in the inland buffer zone does not show up on visitor surveys as being a detriment to the visitor experience. Refer to response 2 above and the enabling legislation's statement providing for the fullest economic utilization of the renewable resources. Timber falling by hand saws and removal of timber by horse may not meet this directive.

25

I submit the draft management is incomplete without a discussion of the issue regarding horse logging vs. internal combustion engine based logging. I expect a discussion of the environmental impact of both alternatives. I expect a detailed cost/benefit analysis of both alternatives utilizing a clear and detailed definition of sustained yield timber management within the inland buffer zone.

Studies have shown there is great benefit to the forest if horse logging is used. Studies have shown it is economically profitable for a logging company to engage in horse logging.

In summary:

I am asking for a clear definition and plan of sustained yield timber management within the inland buffer zone as the term is used in the draft management plan. A draft management plan without a clear definition and plan of sustained yield timber management makes any reference to sustained yield timber management within the draft meaningless.

I am asking, where have you come up with, and specifically what enabling legislation allows you, this proposal of a "demonstration forest". This must be clearly stated in the draft management plan.

I am asking you to no longer allow internal combustion engine based logging within the inland buffer zone. I am asking you allow only horse logging and human powered timber falling. I am asking for a cost/benefit analysis between the two alternatives. I am asking for a justification within the draft as to why you are allowing internal combustion engine based logging within the buffer zone when horse logging and hand powered timber falling would solve noise and other problems. I am asking for a statement concerning the connection between this justification and the enabling legislation.

RESPONSES

6. Please refer to response 5 above.

Wilderness

My comments here concern only the wilderness boundaries as defined in the preferred alternative and alternative E. The preferred alternative includes 12,843 acres of wilderness. Alternative E includes 18,063 acres of wilderness. I am going to encourage you to increase wilderness acreage of the preferred alternative to 18,063.

I have two arguments for this.

1. Let us say I just caught two beautiful trout. I have one in my left hand and one in my right hand. I say to my friend, "look at my two trout". Then I say, "The one in my left hand is a trout and the one in my right hand is a bass.". What non-sense, a trout is a trout. A trout is not a bass.

Similarly, wilderness is wilderness. 18,063 acres of wilderness is not wilderness one minute and 12,083 acres of wilderness plus 5,220 acres of non-wilderness the next. If we have 18,063 acres of wilderness in the Pictured Rocks National Lakeshore, it is time to make 18,063 acres of wilderness part of the final draft management plan.

2. The process of getting wilderness designation is long and part of the politics of the time. Compromise of some sort will inevitably be called for. No doubt, if you ask for 12,000 acres, you may get 6,000 acres. If you ask for 18,063 acres, you may get 12,083 acres.

If you ask for 18,063 acres and get 18,063 acres which is as it should be, so much the better. If you are forced to compromise, you will have room to do this.

If you are going to manage by this management plan, you need to include a discussion of the compromise scenarios of a wilderness request. This is a political process and there are no guarantees.

7.

To lend validity and completeness the draft management plan must cover the following scenario: What does the NPS plan to do if the wilderness proposal is denied completely or altered significantly by compromise?

7. Regardless, if wilderness is or is not designated by Congress, the areas would continue to be managed under the primitive prescriptions as described in the alternative.

There is a strong determination by the NPS to improve H-58 and some of the other roads in the lakeshore. The preference is to lay an asphalt surface but at minimum install a gravel surface.

Comments preferred alternative and alternative E:

My reading of the draft document indicates that Alger county can pave H-58 at will where H-58 is outside of the park property and the buffer zone. The only real issue is whether the park service wants to contribute funds. I don't see the park service as having any control over this. Alger county can always come up with the money on their own. My comments exclude this section of H-58.

I will limit my comments to the section of H-58 from just beyond Kingston Lake to the Hurricane River campground. My comments also apply to all other unimproved roads within the inland buffer zone and NPS owned lands.

The preferred alternative would like to pave this section of H-58. Alternative E will settle for improved gravel. In each case speed limits will increase. Actual vehicle speeds will often times be far greater than the posted speed limit as is the case for all roads.

Road kill will increase dramatically. The gray wolf will die at the hands of these speeding vehicles. A wolf is opportunistic. He'll hang around the road hoping for a quick road kill meal. Soon, he is hit himself by a speeding vehicle on the paved road. The bald eagle will die at the hands of these speeding vehicles while swooping down to grab a hapless squirrel, a previous victim of the speeding vehicle. Hawks, doves, songbirds, turkeys, squirrels, raccoons, possums, fox, bear, coyote, and all living creatures in the lakeshore will have increased death rates at the hands of these speeding vehicles. The crow population will increase with the increased volume of road kill. With an increased crow population will come a decreased song bird population. The ramifications of this increased road kill at the hands of the speeding vehicle are extraordinary.

The draft management plan has not addressed the significant issue of increased road kill due to road improvements within the inland buffer zone and park property. The draft management plan has not addressed the legal ramifications of advocating a scenario of increased road kill in light of NPS regulations prohibiting the killing of wildlife.

A complete study must be done on the effects of increased road kill due to road improvements within the park and inland buffer zone. The results should be included in all discussions in the draft management plan of road improvements to H-58 and other park roads.

National Park regulations do not allow the killing of wildlife outside of permitted hunting seasons. To kill wildlife is against the law.

8. The National Park Service is not advocating for increased road kill. H-58 is a county owned and maintained right-of-way; it is not under national lakeshore authority. There have been no reported road deaths of gray wolf, bald eagle, or other species of concern on similar paved roads in the immediate area on which to base an assumption that these species will be killed at an increased rate on an improved H-58.

The draft management plan should address the issue of legality regarding road improvements and the resulting wanton killing of significant numbers of wildlife species within park boundaries due to increased vehicle speed and volume from the road improvements.

Thank-you Wowfor Meeuses 10/21/03 To: piro_gmp@nps.gov

CC:

Subject: Comment on Management Plan

I have used the Pictured Rocks Lakeshore area a number of times as a hiker and backpacker. It is a very unique area and I support any plan that will preserve its pristine features. It is a wonderful area to backpack, primarily because there are no cars, no dogs, and no jet skis. I would urge you to retain this aspect of the area as much as possible. There are many campgrounds close by, with some in the park, that are accessible by car. I believe that it would be detrimental to open further access to the hiking trail along the lakeshore.

I have seen people enter the park via speed boat to Chapel Beach and unload dogs, who ran around the beach without leashes. It appears that people who can access the park easily do not follow the posted rules and negatively impact other people's wilderness experience. There are inadequate numbers of staff to enforce rules for these kinds of visitors and I do not believe we want this type of visitor to backcountry areas. Therefore, I strongly oppose Alternative C, which would increase access to the lakeshore.

It appears that A would maintain the status quo, with the exception of upgrading H58. This would be very acceptable to me because I like the park the way it is now and believe it has ample opportunities for a variety of outdoor activities and activity levels.

Since Proposal D is the "preferred" alternative, I would certainly consider that as viable. It would be nice to have upgraded visitor centers, but I don't believe it is necessary. The designation of the Beaver Lake basin as a wilderness area seems to be a good idea, but I have concerns about the impact that would have on the use of the area. The Sylvania Tract in Watersmeet has that designation and there are severe restrictions on food containers, toilet pits, etc. This may actually reduce or discourage use if there are severe restrictions like that. I think you should add more campsites at Beaver Lake - perhaps another campground with 10 more sites.

I <u>totally</u> support a prohibition of snowmobiles in the park. If there weren't trails along the south side of H58, I might consider snowmobile use in the park. But, there are trails available parallel to the park so it would not be a good idea to allow them in the park. It is unnecessary and they are an unwelcome noise pollutant to backcountry areas.

I also support any restrictions of jet skis along the lakeshore. They are very noisy and annoying and truly ruin the wilderness experience for anyone within hearing distance. It's bad enough to hear the tour boat and personal watercrafts, but jet skis have such annoying high whine sound, they must be banned from backcountry areas. This opinion applies to any motorized vehicles that make noise, ie motorcycles, ATVs, etc.

Based on my experience at Grand Island, I would love to see some bike trails developed along the Lakeshore. More people are biking and I think the pictured rocks area would be a great place to have bike and camping opportunities. I would like to see money spent on this endeavor, rather than upgraded visitor centers.

With my use of the backcountry this past summer, I appreciated the makeshift benches placed at campsites along the trail. I would recommend upgrading these sites by making sure each site, including group sites, has 2x4 board benches and there are more bear boxes throughout the park for campers.

It is a wonderful park and every staff member with whom I have been in contact was friendly and helpful. Keep up the good work. We love this area and use it frequently.

Lynn Moon 320 Cedar Street Marquette, MI 49855 906-228-8522 LMoon320@aol.com

Lynn Moon

1. Adding more campsites to the Little Beaver Lake campground would change the rustic and intimate character of this campground that is surrounded by lands in the primitive prescription.

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Name: Peters		Le	w'is
Last Name			First Name
Affiliation (If any) 600 Brickyard	Rd.		
Mailing Address Marquette		MI	49855
City		State	ZIP

What makes Pictured Rocks National Lakeshore special to you? The opportunity to hike in a quiet natural forest see beautiful scenery, learn local geology, identify birds and plants, collect blueberries. A great place to bringvisit Which alternative do you prefer and why? I favor the Preferred Alternative because it allows some wilderness but keeps most of the Park needily accessible to all. Alternative E would also be satisfactory for my What is your opinion of the Preferred Alternative and how could we improve it? Why? on interests

(1) I would prohibit gasoline powered watercraft both to eliminate noise and especially to prevent water pollution. Electric motors would be non-polluting and quiet making them much less intrusive on persons using paddles or cars for watercraft.

(2) Even the more densely developed areas, near Munising and Grand Marais, should be as natural as possible: no night lighting directed skyward or horizontally, no loudspeakers, rock concerts, or the like.

(3) Do not add any paved roads in the Lakeshore area proper. I think a well graded packed gravel road would be best for the buffer area. What else would you like to tell us? I have visited the Lakeshore many times - Summer, fall, and winter, it's a place I like to bring greests Some from other states and even from Germany and Belgium. Comments may be left with a planning team member at the meeting or mailed to: Pictured Rocks National Lakeshore, P.O. Box 40, Munising, MI 49862. The comment period closes October 31, 2003.

Lewis Peters

1. Please see response 2 to the Burt Township Board.

MR. GRANT A. PETERSEN 217 East Chocolay Street Munising, Michigan 49862

October 30, 2003

Ms. Karen Gustin, Superintendent Pictured Rocks National Lakeshore P.O. Box 40 Munising, Michigan 49862-0040

Regards: Comments - Draft General Management Plan/Wilderness Study/ Environmental Impact Statement

Dear Karen:

Based on my 'pre-retirement' participation in the planning process that has produced this draft document coupled with my perspective as a 22 year resident of Munising and recreational user of the national lakeshore, I offer my general support of the Preferred Alternative. That support, however, comes with several reservations and recommendations for alterations or clarifications in the management prescriptions associated with the alternative are offered.

1.

2.

- + Descriptive text associated with the Primitive Prescription (pages 61 and 62) describes the 'exception' to the depiction of this prescription on the map (page 57/58) as it relates to the Little Beaver Road and campground corridor. Most readers/users of this document will rely principally on the map to identify the locations of the applied prescriptions. For this reason, this casual recreation corridor/campground area should be clearly depicted on the map. This is not unlike what is done in the case of the Chapel area casual recreation prescription. At a minimum, there should be a 'textual note' added to the map indicating that the Little Beaver Road corridor and associated campground and interpretive trail area would be managed as casual recreation. While this comment is offered in a clarfication vein, the next is a clear reservation of support for the preferred alternative. Specifically it is a recommendation for a change from primitive to casual recreation in the management prescription for the 1/4 mile area of Lake Superior offshore of the proposed wilderness boundary.
- + The 'Impacts of the Preferred Alternative' section of the document fails to offer compeling reasoning notably pages 179/80 for eliminating motorized watercraft: clearly the intent of the application of the 'offshore primitive' prescription to the water area offshore of the proposed wilderness. Combine this with the decision to continue to maintain the Little Beaver road corridor and campground with it's associated road and vehicle accessible campground noises and activities at the boundary of the

Grant A. Petersen

- The scale of the alternative maps would make it difficult to depict the Little Beaver Lake campground as casual recreation; therefore the decision was made to explain this in the accompanying text. It is important for readers to understand both the maps and written text to fully understand the alternatives.
- 2. Please see response 4 to the city of Munising's resolution.

proposed wilderness, and the rationale for the primitive prescription in the 1/4 mile offshore area is further weakened.

3.

+ An additional recommendation for a management prescription change is offered with respect to the area between Sable Lake and the Log Slide with H-58 (and its associated vehicle use) coursing through it. Based on the 'Appropriate Activities or Facilities' narratives, this area should be described as 'casual recreation' as opposed to 'primitive'.

Wilderness Proposal Comments

Having evaluated the resources of the national lakeshore and concluding that the Beaver Basin area possess wilderness attributes, National Park Service and Department of the Interior managers are encouraged to approve the wilderness proposal and to submit it to the Office of the President. As each year passes the imprint of human occupation and resource extraction within the proposed area is further diminshed increasing the appropriateness of wilderness designation. Clearly noticeable 'impacts of man' when my Superintendency and recreational use of the Beaver Basin began in 1981 are largely unrecognizable as such today. This is most notably the case with respect to former 'forest roads' and landscape impacts associated with seasonal 'camp' use and activities on former Michigan-Wisconsin Pipeline Company lands. While it can be argued that the proposed wilderness area will never offer the degree of 'solitude' and spaciousness associated with the large 'western' wilderness areas, it would definitely be on a par with the 'eastern wilderness' areas proposed or designated since the mid-1970's. It is hoped that the Service and Department 'decision makers' will honor the recommendations of the planning team professionals by displaying a willingness to advance the proposal to the political decision making phase.

Inland Buffer Zone

An expressed objective of preparing a new General Management Plan for the national lakeshore was to address management and use of the inland buffer zone. While the draft presents the 'crux' of inland buffer zone management (reliance largely on local zoning) as stated by the current park "Land Protection Plan", it fails to express what actions the National Park Service would take in the event of inadequate zoning ordinances and/or administration. Such a clear statement is especially critical now with the 'bail out' of zoning administration by Alger County and the resulting current efforts of Munising Township in particular to formulate a zoning ordinance which would cover a significant portion of the national lakeshore buffer zone. The National Park Service needs to state clearly in the General Management Plan its intent to insure use and management of the inland buffer zone area of the park as intended by the enabling legislation. The actions the agency might take - promulgation of land use regulations, land acquisition, etc. - to insure land and resources use and management as legislatively intended should be clearly stated.

- 3. This area received the primitive management prescription to reduce the impact on the adjacent Grand Sable Dunes and provide a more primitive experience at the proposed boat-in campsite at Grand Sable Lake.
- 4. We added under "Brief Description: Pictured Rocks National Lakeshore" the following text "Ranger staff monitor land use practices in the inland buffer zone and assist the townships and the city in education and enforcement of their zoning ordinances. The National Park Service works closely with the local zoning administrators to ensure that zoning ordinances are followed and that administration of those ordinances fulfills the intent of the inland buffer zone and carries out the mandates of the enabling legislation."

While a number of 'proof readers' comments could be offered these can best be provided by means of a 'sit down' with a planning team member. One I would offer at this juncture is a correction in the spelling (page 222) of Congressman Stupak's name. It is NOT Stupack. A second is the difference between the national lakeshore being 'authorized' and 'established'. It was 'authorized' as America's first national lakeshore in 1966 but was not formally 'established' until 1972.

Sincerely,

Grant A. Petersen

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Mark Sadak

1. Please see response 2 to the Burt Township Board.

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James Seibert
1. Please see response 2 to the Burt Township Board.

Comments may be left with a planning team member at the meeting or mailed to: Pictured Rocks National Lakeshore, P.O. Box 40, Munising, MI 49862. The comment period closes October 31, 2003.

Charles Stimac

1. Please see response 4 to the city of Munising's resolution.

COMMENTS RESPONSES

General Management Plan Comments Pictured Rocks National Lakeshore National Park Service U.S. Department of the Interior Name: Last Name Affiliation (if any) SILVERY 3015 Mailing Address 48124 DEARBORN City ZIP State What makes Pictured Rocks National Lakeshore special to you? lothe lakeshore's pristing condition and scenic variety accross the reach of the NDS's lakestore boundary. 2. Knowledge Hut a tike of amile or so will bring seperity i solitude. Which alternative do you prefer and why? The preferred a Hernative - not because it is the one I personally prefer, but because it seeks compromise/middle ground and seeks to meet the needs of diverse constituences. What is your opinion of the Preferred Alternative and how could we improve it? Why? What else would you like to tell us? Thanks for your efforts to Isston to all points of your. Thanks to the NPS for preserving this national treasure in ways that it may be enjoyal long after I am gone mber at the meeting or mailed to: Pictured Comments may 1 Kenneth and Sue Ward 1g, MI 40862. The comment period closes Octo-Rocks National I 301 S. Silvery Lane ber 31, 2003. Dearborn, MI 48124-1226

2.

Kenneth Ward

- 1. Please see response 4 to the city of Munising's resolution.
- 2. The change in management prescription from primitive to casual recreation on Lake Superior could allow for this type of water taxi service if a need exists and an operator could be found.

"Don Watson" <dwatson@chartermi. net>

To: <piro_gmp@nps.gov>

Subject: Management Plan Comments

10/18/2003 08:19 AM AST

I am in favor of adopting Alternative C as the guideline to be used in drafting a final Management Plan. I think it suites the majority of the public's needs.

This plan appeals to me because it improves access to the park and provides for additional facilities. It's important to provide access to as many of the park's features as possible. While this may increase noise levels in some areas, there are still many areas within the park that are remote for those who wish to have a true "wilderness experience".

Motorized boat access to the lakeshore and cliffs is a must. I think it shows extreme arrogance to keep motorized boat traffic away from the shoreline. It discriminates against those of us who choose to enjoy the lakeshore from motorized vessels.

This option does not include a wilderness designation plan!! Within the boundaries of the PRNL there are lots of wilderness opportunities for those who choose to seek it. There are areas with low road densities to provide adequate opportunities.

One last item, one that I read about in the early 80's when the current plan was drafted and I didn't live in this area and didn't think it would effect me, is the ban on trapping within the PRNL. I think trapping activities consistent with state regulations should be restored. Trapping has minimal impact to the area and is an activity that would occur during lower use times (late fall and winter months).

Thank you.

Don Watson

PO Box 103

Wetmore, MI 49895

Don Watson

1. Please see response 4 to the city of Munising's resolution.